

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

K.W., T.O., S.D.,)	
)	
Plaintiffs,)	
)	Civil Action No. 1:25-cv-03201-TRJ
v.)	
)	
JANKI MOTEL, INC.)	JURY TRIAL DEMANDED
)	
Defendant.)	

**DEFENDANT’S NOTICE TO TAKE THE
VIDEO DEPOSITION OF PLAINTIFF K.W.**

PLEASE TAKE NOTICE that on Thursday, November 6, 2025, beginning at 10:00 a.m. at Walton Spence, LLP, 320 Residence Avenue, Suite A, Albany, Georgia 31701, the undersigned counsel for defendant will take the video deposition of K.W. pursuant to Rule 30 of the Federal Rules of Civil Procedure for all purposes authorized by law before a court reporter duly authorized to administer oaths. The deposition will be taken before a certified court reporter and videographer or some other officer duly authorized by law to take depositions and will continue from day to day, excluding Saturdays, Sundays, and holidays, until its completion.

This 3rd day of November, 2025.

[SIGNATURE ON FOLLOWING PAGE]

FREEMAN MATHIS & GARY, LLP

/s/ Emma J. Fennelly

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing
**DEFENDANT’S NOTICE TO TAKE THE VIDEO DEPOSITION OF
PLAINTIFF K.W.** with the Clerk of Court using the CM/ECF system which will
automatically send email notification of such filing to the following attorneys of
record:

Patrick J. McDonough
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Anderson Tate & Carr
Attorneys for Plaintiffs

This 3rd day of November, 2025.

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